

June 3, 2022

VIA ECF

The Honorable Sarah J. Netburn  
United States Magistrate Judge  
U.S. District Court for the Southern District of New York  
Thurgood Marshall U.S. Courthouse, Room 430  
40 Foley Square  
New York, New York 10007

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***In re Terrorist Attacks on Sept. 11, 2001, Case No. 1:03-md-1570-GBD-SN (S.D.N.Y.)***

Dear Judge Netburn:

In accordance with this Court's Orders (ECF Nos. 7503, 7749), Al Rajhi Bank and Plaintiffs with claims against the Bank write to jointly update the Court on their meet-and-confer discussions and their proposed schedule for jurisdictional discovery.

The Bank has made multiple document productions including thousands of pages on a rolling basis, but additional time is needed to substantially complete production. The Parties have therefore met and conferred and have agreed on a modified schedule for completion of jurisdictional fact discovery. The Parties agree as follows:

- Al Rajhi Bank shall use reasonable best efforts to substantially complete production of documents in response to Plaintiffs' requests for production consistent with the Court's Order (ECF No. 7378) on or before July 22, 2022. Documents shall be produced on a rolling basis.
- Document discovery, interrogatories, requests for admission, and fact depositions shall be completed on or before November 18, 2022.
- Document requests, depositions, interrogatories, requests for admission, and any applications to the Court with respect to the conduct of discovery must be initiated in time to be concluded by November 18, 2022.
- Absent extraordinary circumstances, no application to the Court regarding the conduct of discovery will be considered if made later than October 19, 2022.
- By October 4, 2022 (i.e., 45 days before the completion of jurisdictional fact discovery), the Parties shall submit a joint letter setting forth their joint proposal or separate proposals for expert discovery, if any.

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The Parties will continue to meet and confer on other areas of discussion, and will bring any disputes to the Court only if necessary.

Respectfully submitted,

*/s/ Nicole Erb*

Christopher M. Curran  
Nicole Erb  
Matthew S. Leddicotte  
Reuben J. Sequeira

*Counsel for Al Rajhi Bank*

cc: Counsel of Record (via ECF)